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OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION

April 25, 2013

IN REPLY REFER TO:

Mr. Andrew Taylor
Enforcement Officer
Case Development, Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
8th Floor, SFD-7-5
San Francisco, CA 94105

Re: 104(e) Request for Information – San Fernando Valley Area 2 Superfund
Site Real Property located at 3235 N. San Fernando Road, Los Angeles,
CA (Former Aerol Company Facility)

Dear Mr. Taylor:

This office is counsel to Aerol Co., Inc., and your letter of April 12, 2012 has been directed to me for response. First, you should be advised that Preece Acquisition Company was formed in 1993 for the acquisition of the assets of Aerol Company, Inc., in 1994. Subsequent to the acquisition, the company changed its name to Preece/Aerol, Inc. The company has since changed its name to Aerol Co., Inc. At no time did Preece Acquisition Company acquire any interest in Aerol Company, Inc., and it does not have information regarding the operation of the Aerol Company, Inc.¹

Further, while Preece Acquisition Company operated at the 3235 N. San Fernando Road address, it was under a lease agreement with the then owners and at no time did Preece Acquisition Company have any interest in the real property. Preece Acquisition Company operated the business at the 3235 N. San Fernando Road address for only a period of less than three years. Thereafter, it moved all operations to its current location at 19560 S. Rancho Way, Rancho Dominguez, California.

The following is Aerol Co., Inc.'s responses to the 104(e) Request for Information:

ATTACHMENT B: INFORMATION REQUEST²

¹ Prior to receiving the 104(e) Request for Information, Aerol Co., Inc., directed its attorneys to destroy all documents relating to the acquisition of the assets of Aerol Company.

² All responses or documents produced pursuant to this 104(e) Request for Information relate solely to Aerol Co., Inc. There has never been any affiliation between Aerol Co., Inc., and Aerol Company. Preece Acquisition Company was formed for the sole purpose of acquiring the assets of Aerol Company and was not a division, shareholder, subsidiary or other interest holder in Aerol Company.

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1. Fred Seibert, Secretary of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA

Ron Olivier, President of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA

Hema C. Bhamre, Attorney for Aerol Co., Inc.
Self & Bhamre
4400 MacArthur Blvd., Suite 320
Newport Beach, CA 92660

2. Aerol Co., Inc., is a California corporation previously known as Preece/Aerol, Inc., and Preece Acquisition Company. As indicated above, Preece Acquisition Company was formed in December of 1993 for the purpose of acquiring the assets of Aerol Company, Inc. In September of 1994, Preece Acquisition Company changed its name to Preece/Aerol, Inc. In August of 2011, Preece/Aerol, Inc. changed its name to Aerol Co., Inc.

The various companies operated under a "dba" as Aerol Co., Inc.

3. Joseph Preece, President (deceased) 1994 to Dec. 23, 2000
Fred Seibert, Secretary, President 1994 to present
4. Joseph Preece (deceased)
Fred Seibert
Ron Ruther
Jim Redmon
5. Joseph Preece (deceased) initially owned 100% of the shares of Preece Acquisition Company. Thereafter, shares were transferred to and for the benefit of Fred Seibert. As of August of 2011, the sole shareholder is Seibert Holdings, Inc.
6. There was never any corporate affiliation between Preece/Aerol, Inc., and the Aerol Company.

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Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

7. No organizational charts exist for Preece Acquisition Company or Preece/Aerol, Inc. while operating at the Facility.

Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

8. Respondent is unclear as to what the Requestor means by “annual or other periodic report.”

Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

9. Respondent will produce the minutes, recordings, summaries or reports of meetings, to the extent that they exist of Aerol Co., Inc.

Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

10. Respondent will produce the minutes, recordings, summaries or reports of meetings, to the extent that they exist of Aerol Co., Inc.

Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

11. Aerol Co., Inc., has no information as to how and when Aerol Company ceased business operations.

Aerol Co., Inc., is not in possession of any business records relating to Aerol Company.

12. No Corporate Asset Transactions have taken place since Preece Acquisition Company acquired the assets of Aerol Company. All documentation was destroyed prior to receipt of this request.

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13. – 17. Not applicable.

18. Aerol Co., Inc., is a wholly owned (100%) subsidiary of Seibert Holdings, Inc., a California corporation.
19. Aerol Co., Inc., has not participated in any joint ventures.
20. Aerol Co., Inc., vacated the facility located at 3235 N. San Fernando Road, Los Angeles, California on or about 1996. Since that time, no individual has been responsible for the environmental matter who is employed by Aerol Co., Inc.
21. Aerol Co., Inc., is a California corporation previously known as Preece/Aerol, Inc., and Preece Acquisition Company. As indicated above, Preece Acquisition Company was formed in December of 1993 for the purpose of acquiring the assets of Aerol Company, Inc. In September of 1994, Preece Acquisition Company changed its name to Preece/Aerol, Inc. In August of 2011, Preece/Aerol, Inc. changed its name to Aerol Co., Inc.

Preece Acquisition Company operated at the 3235 N. San Fernando Road location until approximately 1995. Thereafter, vacated the premise and did not have any operations at the facility.

22. Aerol Co., Inc., has made no business investments in any other business.
23. Joseph Preece (deceased)
24. Aerol Co., Inc., had no ownership interest in 3235 N. San Fernando Road.
25. Aerol Co., Inc., had no ownership interest in 3235 N. San Fernando Road.
26. Aerol Co., Inc., operated at 3235 N. San Fernando Road from December 1993, until it relocated in 1996.
27. Aerol Co., Inc., believes that the Facility was owned by Aerol Company. Aerol Co., Inc., is not in possession of any leases between Preece Acquisition Company and Aerol Company. A shareholder of Aerol Company, David Harman, may

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have additional information regarding the facility. Last known address was 943 E. Newman Lane, Placentia, CA 92670.

28. Aerol Co., Inc., is unaware of any individual or entity that owned or operated the Facility after Aerol Co., Inc., vacated the premises. Aerol Co., Inc., believes that Aerol Company operated the facility prior to Aerol Co., Inc., purchased the assets.
29. Aerol Co., Inc., will provide a list of current employees who may have also worked for Aerol Company.
30. Aerol Co., Inc., is an OEM supplier of casts and wheels.
31. Aerol Co., Inc., does not believe that any chromium-related substances were utilized in any of its operations at the facility.
32. Aerol Co., Inc., is not in possession of a map of the facility.
33. Aerol Co., Inc., does not have any copies of hazardous material business plans and chemical inventory forms for the time period that it operated at the facility.
34. Aerol Co., Inc., is not in possession of any Material Safety Data Sheets for any chemicals used at the facility.
35. Aerol Co., Inc., does not believe that any chromium-related substances were utilized in any of its operations at the facility.
36. Aerol Co., Inc., is not in possession of any environmental data or technical or analytical information regarding soil, water and air conditions for the time period that it operated at the facility.
37. Aerol Co., Inc., is not in possession of any information regarding groundwater wells at the facility.
38. INSURANCE FOR AEROL AT THE FACILITY
39. Aerol Co., Inc., is not in possession of any copies of applications for permits or permits received for the facility.

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40. Aerol Co., Inc., did not discharge any of its waste stream to the sewer at the facility.
41. Aerol Co., Inc., does not have any records relating to a waste stream generated at the facility.
- 42 – 46. Not applicable.

ATTACHMENT C: INFORMATION REQUEST FOR METAL FINISHERS

1. Fred Seibert, Secretary of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA
- Ron Olivier, President of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA
- Hema C. Bhamre, Attorney for Aerol Co., Inc.
Self & Bhamre
4400 MacArthur Blvd., Suite 320
Newport Beach, CA 92660

2. Aerol Co., Inc., did not perform any metal finishing at the facility.
- 3 – 20. Not applicable.

ATTACHMENT D: INFORMATION REQUEST FOR FACILITIES THAT HAVE UTILIZED COOLING SYSTEMS

1. Fred Seibert, Secretary of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA
- Ron Olivier, President of Aerol Co., Inc.
19560 S. Rancho Way

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Rancho Dominguez, CA

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Self & Bhamre
4400 MacArthur Blvd., Suite 320
Newport Beach, CA 92660

2. Aerol Co., Inc., did not utilize cooling systems or cooling towers at the facility.
- 3 – 19. Not applicable.

ATTACHMENT E: INFORMATION REQUEST FOR FACILITIES THAT HANDLES
VOLATILE ORGANIC COMPOUNDS

1. Fred Seibert, Secretary of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA

Ron Olivier, President of Aerol Co., Inc.
19560 S. Rancho Way
Rancho Dominguez, CA


Hema C. Bhamre, Attorney for Aerol Co., Inc.
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4400 MacArthur Blvd., Suite 320
Newport Beach, CA 92660

2. Aerol Co., Inc., did not utilize volatile organic compounds at the facility.
- 3 – 20. Not applicable.

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If you need additional information, please do not hesitate to contact the undersigned.

Very truly yours,



Hema C. Bhamre